

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**KELLY ELAINE SLAYTON,
SPN #030378865,**

Plaintiff,

v.

RYAN NGUYEN, et al.,

Defendants.

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CIVIL ACTION NO. 4:22-cv-04431

**APPENDIX OF EVIDENCE IN SUPPORT OF DEFENDANTS
HARRIS COUNTY AND RYAN NGUYEN'S MOTION FOR SUMMARY
JUDGMENT**

Pursuant to Local Rule LR 7.7, Defendant DEFENDANTS HARRIS COUNTY and RYAN NGUYEN ("Defendants") submits the following Appendix of Evidence in Support of the Defendants' Motion for Summary Judgment. The following exhibits, and other competent evidence are attached and incorporated by reference to this Appendix:

AFFIDAVIT	Affidavit of the Custodian of Records For The Harris County Sheriff's Office signed by Candice Kelley
AFFIDAVIT	Affidavit of Ketrick V. McCutcheon
AFFIDAVIT	Affidavit of Chris Lee
AFFIDAVIT	Affidavit of Ryan Nguyen
EXHIBIT A:	Grievance Board and PREA investigation of Plaintiff Claims _redacted [Bates no. HC_0001-HC_0102]

Grievance 49117 at Bates HC_0001
Grievance 49346 at Bates HC_0014
Grievance 49982 at Bates HC_0030
Grievance 50358 at Bates HC_0037
Grievance 50575 at Bates HC_0043
Grievance 46047 at Bates HC_0074
Grievance 46320 at Bates HC_0079
Grievance 47756 at Bates HC_0082

EXHIBIT B: (2017-12-12) CJC-211-Inmate-Grievance-
Policy
[Bates no. HC_0103-HC_0107]

EXHIBIT C: (2019-11-18) CJC-209-Inmate-
Correspondence
[Bates no. HC_0108-HC_0117]

EXHIBIT D: (2021-04-26) CJC-116-PREA Investigations
[Bates no. HC_0118-HC_0146]

EXHIBIT E: (2021-06-17) 231-Internal-Investigations
Policy
[Bates no. HC_0147-HC_0154]

EXHIBIT F: Inmate-Handbook-English (4-19-2021)
[Bates no. HC-0155-HC_0232]

Date: February 5, 2024

Respectfully submitted,

CHRISTIAN D. MENEFFEE
HARRIS COUNTY ATTORNEY

JONATHAN G. C. FOMBONNE
DEPUTY COUNTY ATTORNEY AND FIRST
ASSISTANT

NATALIE G. DELUCA
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**Attorneys for Defendants Harris County and
Ryan Nguyen**

CERTIFICATE OF SERVICE

I certify that, pursuant to Federal Rules of Civil Procedure, a true copy of the instrument to which this Certificate is attached was duly served upon Plaintiff as indicated:

Pro Se Plaintiff
Via regular mail
Kelly Slayton
SPN 03078865
1200 Baker Street
Unit 4A1A
Houston, Texas 77002

/s/ James C. Butt
James C. Butt